

May 14, 2001

Martin J. Heiny
Grabill Cabinet Company
P.O. Box 40
Grabill, IN 46741

Re: 003-13893-00038
Second Administrative Amendment to
Part 70 003-5952-00038

Dear Martin J. Heiny:

Grabill Cabinet Company was issued a Part 70 permit on December 28, 1998 for a hardwood cabinet manufacturing operation. A letter requesting addition of a research and development paint booth and a medium density fiberboard coating booth to the existing source was received on February 28, 2001.

The **research and development booth** will be used for development of new finishing schemes. The R & D activity will be carried out in the close supervision of technically trained personnel. The product from this booth will not be sold or exchanged for commercial profit. Average coating application rate is expected to be less than two gallons per week of NESHAP compliant coatings. The annual usage will be limited to less than 250 gallons. Therefore, pursuant to 326 IAC 2-7-1 (21)(E), this modification is an insignificant activity.

The **medium density fiberboard coating booth** will be used for application of white catalyzed primer on MDF panels. This coating has a VOC content of 3.41 pounds per gallon. The usage of NESHAP compliant coating will be less than five gallons per week. The annual potential to emit of Volatile Organic Compounds from this coating booth is 887 pounds. Therefore, pursuant to 326 IAC 2-7-1 (21)(A), this modification is an insignificant activity.

The two new booths are insignificant activities. Therefore, pursuant to the provisions of 326 IAC 2-7-11 (8) the permit is hereby administratively amended as follows (language deleted is shown with ~~strikeout~~ and added is shown in **bold**):

1. The condition A.3 is modified as follows:

A.3	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
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~~This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.~~

This stationary source also includes the following insignificant activities, which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) **one (1) surface coating booth used for research and development activity.**
- (b) **one (1) surface coating booth used for coating medium density fiberboard panels, with maximum usage of less than five gallons per week.**

2. On the semi-annual report, facility description is changed as follows:

Facility: thirteen (13) paint booths + **Research and Development and MDF coating booths.**

All other conditions of the permit shall remain unchanged and in effect. The name Office of Air Management has been changed to Office of Air Quality. A complete revised Title V Operating Permit reflecting the above changes is attached to this letter. Please replace the original permit with this amendment and revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Gurinder Saini, at (800) 451-6027, press 0 and ask for Gurinder Saini or extension 3-0203, or dial (317) 233-0203.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

GS

cc: File - Allen County
U.S. EPA, Region V
Allen County Health Department
Air Compliance Section Inspector –Jennifer Dorn
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for a Part 70 Minor Source
Modification.**

Source Background and Description

Source Name:	Grabill Cabinet Company
Source Location:	13805 State Street, Grabill, IN 46741
County:	Allen
SIC Code:	2599
Operation Permit No.:	T 003-5952-00038
Operation Permit Issuance Date:	December 28, 1998
Minor Source Modification No.:	003-13983-00038
Permit Reviewer:	Gurinder Saini

The Office of Air Quality (OAQ) has reviewed a modification application from Grabill Cabinet Company relating to the construction of the following emission units and pollution control devices:

- (a) one (1) surface coating booth used for research and development activity.
- (b) one (1) surface coating booth used for coating medium density fiberboard panels, with maximum usage of five gallons per week.

History

On February 28, 2001, Grabill Cabinet Company submitted an application to the OAQ requesting to add additional surface coating booths to their existing plant. Grabill Cabinet Company was issued a Part 70 permit on December 28, 1998.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

There are no new stacks.

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on February 28, 2001, Additional information was received on March 28, 2001.

Emission Calculations

The two new booths are insignificant activities as described below:

- (a) The research and development (R & D) booth will be used for development of new finishing schemes. The R & D activity will be carried out in the close supervision of technically trained personnel. The product from this booth will not be sold or exchanged for commercial profit. Average coating application rate is expected to be less than two gallons per week of NESHAP compliant coatings. The annual usage is estimated to be less than 250 gallons. Therefore, pursuant to 326 IAC 2-7-1 (21)(E), this modification is an insignificant activity.
- (b) The medium density fiberboard coating booth will be used for application of white catalyzed primer on MDF panels. This coating has a VOC content of 3.41 pounds per gallon. The usage of NESHAP - JJ compliant coating will be less than five gallons per week. The annual potential to emit of Volatile Organic Compounds from this coating booth is 887 pounds. Therefore, pursuant to 326 IAC 2-7-1 (21)(A), this modification is an insignificant activity.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	-
PM-10	-
SO ₂	-
VOC	0.44
CO	-
NO _x	-

Pollutant	Potential To Emit (tons/year)
Single HAP	<1
Combination of HAPs	<1

Justification for Modification

The two new booths proposed in this modification are subject to NESHAP 40 CFR 63 subpart JJ for wood furniture manufacturing operations.

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5 (d)(5) because the new booths are subject to National Emission Standard for Hazardous Air Pollutants (NESHAP) - JJ and it is considered the most stringent requirement.

The Minor Source Modification is the approval for construction of these booths. This Minor Source Modification will be incorporated in the Part 70 Operating Permit T003-5952-00038 by a Significant Permit Modification. These booths can be operated only after this Significant Permit Modification to Part 70 Operating permit is issued.

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Allen County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	less than 100
PM-10	less than 100
SO ₂	less than 100
VOC	136.9
CO	less than 100
NO _x	less than 100

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the information contained in the technical support document for the Part 70 Operating Permit T003-5952-00038.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
R & D booth and MDF panel coating booth	-	-	-	0.44	-	-	-
Total	-	-	-	0.44	-	-	-

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12) applicable to these two booths.
- (b) The two new booths as part of the wood cabinet coating operations are subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20-14, (40 CFR 63, Subpart JJ) with a compliance date of December 7, 1998.

Pursuant to 40 CFR 63 Subpart JJ, the wood cabinet surface coating operations shall comply with the following conditions:

- (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. Solvent and thinner mixtures used for other purposes have a ten percent (10.0%) maximum VHAP content by weight; or
 - (C) Use a control device to limit emissions to one 1.0 pound VHAP per pound solids; or
 - (D) Use a combination of (A), (B), and (C).
- (2) Limit VHAP emissions contact adhesives as follows:

- (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids.
- (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.
- (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.
- (3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.
- (4) The source shall complete a work practice implementation plan within sixty (60) calendar days after the source's compliance date as specified in 40 CFR 63.803. The plan must detail how the source will incorporate environmentally desirable practices into the operation.
- (5) A semi-annual summary report shall be prepared and submitted to IDEM, OAM, to document the ongoing compliance status of the wood furniture coating operations.

State Rule Applicability - Individual Facilities

There is no specific State rule applicable to these two new booths.

Testing Requirements

The Source does not have to test these booths.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There is no new compliance monitoring required for these booths.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached Part 70 Minor Source Modification No. 003-12983-00038.